

WITTELS LAW

New York & New Jersey

Steven L. Wittels
Partner
slw@wittelslaw.com

18 Half Mile Road
Armonk, New York 10504
T: (914) 319-9945 F: (914) 273-2563

December 17, 2019

Via ECF

Honorable Jack B. Weinstein
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: No. 17 Civ. 5951 (JBW) (SJB): *Abdullayeva v. Attending Homecare Services LLC*

Dear Judge Weinstein:

On behalf of Plaintiff we write to respond to Defendant's December 11 letter motion to Enforce Judgment. ECF No. 58. Yesterday afternoon my office spoke with defense counsel Daniel Gomez-Sanchez to inform him that this week Plaintiff's counsel will issue Defendant a check to cover the appellate costs ordered by the Second Circuit.

We also discussed that Plaintiff's counsel recently contacted the Union's counsel regarding the grievance and arbitration procedures outlined in Defendant's Collective Bargaining Agreement with the Union. The Union's counsel is considering certain of Plaintiff's requests regarding the grievance and arbitration process for this matter. The undersigned expects that the Union is likely to respond to Plaintiffs' requests in the early part of the New Year.

Mr. Gomez-Sanchez agreed that this will resolve Defendant's December 11 letter motion to Enforce Judgment.

Thank you for the Court's consideration.

Respectfully submitted,

/s/ Steven L. Wittels
Steven L. Wittels

cc: All Counsel of Record (via ECF)